

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

| | | |
|---------------------------|---|-----------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | 1:25-cr-00007-JMS-TAB |
| |) | |
| REINA ISOM, |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT’S MOTION TO CONTINUE
CHANGE OF PLEA/SENTENCING HEARING**

Defendant Reina Isom, by counsel Denise L. Turner, respectfully moves the Court to continue the change of plea/sentencing hearing, and in support states:

1. The change of plea/sentencing hearing is scheduled to commence on June 4, 2025 at 1:30 p.m. Any sentencing memos are due to be filed with the Court on or before May 28, 2025.
2. Counsel for the Defendant is scheduled to begin a multiple-day jury trial in Tippecanoe County (*State of Indiana v. Marquise McDowell*, 79Co1-2407-F3-000020) on June 4, 2025. The case has been confirmed as the first choice setting on that date. Due to this scheduling conflict, counsel is requesting a brief continuance of the Defendant’s change of plea and sentencing hearing.
3. Assistant United States Attorney Adam Eakman has advised undersigned counsel that he has no objection.
4. The ends of justice served by the continuance sought herein outweigh the best interests of the public and the defendant to a speedy trial. Thus the

delay in the trial date attributable to this request for continuance is excludable under 18 U.S.C. 3161 et seq.

WHEREFORE, Defendant Reina Isom, requests that the change of plea/sentencing date of June 4, 2025, be vacated, and that this case be reset for change of plea/sentencing at such other time as the court's calendar will permit.

Respectfully submitted,

Denise L. Turner
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CERTIFICATE OF SERVICE

I certify that on May 19, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Denise L. Turner
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